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August 16,

VIA E-MAIL

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

18-cr-759: USA v. Moore

Dear Judge Berman:

Application granted.	
SO ORDERED: Date: 8/17/21	 Richard M. Berman, U.S.D.J.

We write as counsel for James Moore to request a revision of the sentencing schedule on consent of the government. As we discussed with Ms. Tabolt of Your Honor's chambers last week, Mr. Moore has been unable to review drafts of sentencing materials I have sent him or to access the CorrLinks e-mail system. In light of this, AUSA Vainberg and I contacted chambers to inquire about an available adjourned date to allow me to complete the process with Mr. Moore. Because of the Court's September schedule, as well as Mr. Vainberg's upcoming trial in the White Plains courthouse, we determined that an October date for the sentencing hearing would be necessary to accommodate all parties. We therefore request that the Court adjourn the sentencing as follows, as discussed with Ms. Tabolt: Mr. Moore's memorandum to be submitted by October 13; government memorandum October 20; sentencing hearing (defendant by video conference from FDC [REDACTED]) October 27, 11:30 a.m.

We thank the Court for its attention to this request and are available to answer any questions.

Respectfully submitted,

/s/ Michael J. Grudberg

Michael J. Grudberg

cc: Vladislav Vainberg AUSA (via e-mail)